Subject: Your letter on fertilisers, Integrated Nutrient Management Plan and nitrogen recovered from manure (RENURE)

Ref.: Ares(2022)7500018 of 28/10/2022

Dear [Name1] and [Name2],

Thank you for your letter sent on 27 October 2022 to Commissioner Sinkevičius relating to fertilisers, Integrated Nutrient Management Plan and nitrogen recovered from manure (RENURE). He has asked me to reply on his behalf.

As stated in the Commission Communication\(^1\) of 9 November on fertilisers, the use of manure and processed manure, in compliance with the Nitrates Directive, can play a role in helping farmers to reduce their exposure to volatile mineral fertiliser prices and close nutrient cycles.

The Commission strongly encourages the development of RENURE products as a way to recycle valuable nutrients and as substitutes for mineral fertilisers. This approach is in line with a circular economy and can contribute to making available nutrients from animal manure to farmers in areas where there is not sufficient livestock, thus reducing their dependency on mineral fertilisers. It can also alleviate pressure on surplus areas by exporting nutrients to deficit areas.

However, we should be aware that the scope is limited. More than 90% of manure generated in Europe is already directly re-applied to soils as organic fertiliser. This means that at this stage the potential for processing manure concerns less than the 10% of the manure not already applied to soil as a fertiliser.

I would also point out that today farmers can already replace entirely the use of chemical fertilizers by manure or processed manure without any restriction outside polluted areas, and up to the limits allowed by the Nitrates Directive in polluted areas.

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\(^1\) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. Ensuring availability and affordability of fertilisers. COM(2022) 500 final
Nevertheless, the study by the Commission’s Joint Research Centre on RENURE products highlighted that their application would require strict conditions of use since they can cause higher ammonia emissions compared to certain mineral fertilisers.

The *Report on the implementation of the Nitrates Directive*\(^2\) concludes that although considerable efforts to mitigate nitrates losses have brought some progress, the water quality data in many Member States show that the level of implementation and enforcement is still not sufficient to reach the objectives of the Directive. It is therefore essential to ensure that no additional risk in terms of nutrient pollution into air, soil or water is posed by the excessive use of manure and processed manure, especially in the context of the EU Green Deal ambition of zero pollution and the Farm to Fork target of 50% reduction of nutrient losses by 2030.

The circular use of biowaste as fertiliser will be discussed in the Commission’s Integrated Nutrient Management Action Plan\(^3\) which will be adopted at the beginning of 2023. In that context, the Commission will also assess further regulatory and non-regulatory steps to allow for wider use of recovered nutrients from livestock manure. I take the opportunity to thank you for your contribution to the public consultation on this plan and to invite Copa-Cogeca to play an active role to the discussion on how to develop markets for processed manure through which nutrients could be moved from areas with excess of nutrients and high water pollution to areas needing these nutrients.

Yours faithfully,

\[(e\text{-}signed)\]  
Humberto DELGADO ROSA  
The Director

\[\text{c.c.}:\]


\(^3\) [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12899-Nutrients-action-plan-for-better-management](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12899-Nutrients-action-plan-for-better-management)